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7 Attorney for Plaintiff

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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 MICHAEL WARE,

13 Case No.: 2:13-cv-00958-JAD-PAL

14 Plaintiff,

15 vs.

16 CLARK COUNTY, NEVADA,

17 Defendant.

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20 **STIPULATION AND ORDER TO EXTEND SCHEDULED DEADLINES**  
21 **(First Request)**

22 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record,  
23 hereby stipulate and request that this Court extend the Discovery Deadlines in the above-captioned case  
24 for ninety (90), up to and including, April 14, 2014. In support of this Stipulation and Request, the parties  
state as follows:

25 **A. DISCOVERY COMPLETED TO DATE**

26 Plaintiff served his First Request for Production of Documents and his First Set of Interrogatories  
27 to Defendant on September 24, 2013. Plaintiff has not received any discovery requests from Defendant yet.

28 **B. DISCOVERY REMAINING TO BE COMPLETED**

29 The parties in this case are in the middle of discovery and must complete depositions, in addition  
30 to make their expert disclosures.

31 **C. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES**

32 The Early Neutral Evaluation will not take place in this case until November 6, 2013. The discovery  
33 deadlines must be extended because the parties will not be able to designate any potential expert witnesses  
34 by the deadline for expert disclosures, which is currently scheduled for November 14, 2013. Based on the

fact that the ENE is approximately one week before the deadline for expert disclosures, the parties need more time to evaluate their cases and determine whether an expert will be needed.

**D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

1. The last day for Initial Expert Disclosures should be extended to February 12, 2014.
2. The Interim Status Report deadline should be extended to February 13, 2014.
3. The last day for Rebuttal Expert Disclosures should be extended to March 17, 2014.
4. The last day to extend the Stipulated Discovery Plan and Scheduling Order should be extended to March 24, 2014.
5. The close of discovery should be extended to April 14, 2014.
6. The Dispositive motion deadline should be extended to May 13, 2014.
7. The Joint Pre-Trial Order deadline should be extended to June 12, 2014.

DATED this 1 day of October, 2013.

LAW OFFICE OF DANIEL MARKS

/s/ Nicole M. Young  
DANIEL MARKS, ESQ.  
Nevada State Bar No. 002003  
NICOLE M. YOUNG, ESQ.  
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Attorney for Plaintiff

DATED this 1 day of October, 2013.

LEWIS BRISBOIS BISGAARD  
& SMITH, LLP

/s/ Robert W. Freeman  
ROBERT W. FREEMAN, Esq.  
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Las Vegas, Nevada 89118  
Attorney for Defendant

## ORDER

IT IS SO ORDERED.

DATED this 4;    day of   , 2013.

Terry A. Teem  
UNITED STATES MAGISTRATE JUDGE

Respectfully Submitted:

## LAW OFFICE OF DANIEL MARKS

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